

Sealed

Public and unofficial staff access
to this instrument are
prohibited by court order

UNITED STATES DISTRICT COURT

United States Courts
Southern District of Texas
FILED
June 16, 2020

SOUTHERN DISTRICT OF TEXAS

David J. Bradley, Clerk of Court

HOUSTON DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO.

vs.

§
§
§
§
§
§
§
§

4:20-cr-259

JORGE RANGEL CHARLES
and
ANDREA MARIE VASQUEZ,
Defendants.

UNDER SEAL

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

Title 18, United States Code, Sections 641, 2
Aiding and Abetting Theft of Government Property

On or about May 26, 2020, in the Houston Division of the
Southern District of Texas,

JORGE RANGEL CHARLES
and
ANDREA MARIE VASQUEZ,

defendants herein, aiding and abetting each other and others known
and unknown to the Grand Jury, did knowingly embezzle, steal,
purloin, and convert to their use or the use of another, a thing
of value of the United States or of any department or agency
thereof, to wit: the Naval Criminal Investigative Service,

government property, to wit: a 2019 Chevrolet Tahoe; a Colt, MK-18, fully automatic rifle; a Colt, M-4, fully automatic rifle; a Knights armament suppressor; night vision optics for a sniper rifle; and two (2) ballistic vests marked "Special Agent NCIS" on the back and "Police" on the front, all of which have a value greater than \$1,000.

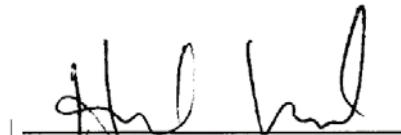
In violation of Title 18, United States Code, Sections 641 and 2.

A TRUE BILL

Signature on file

FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK
United States Attorney



By:

HEATHER RAE WINTER
Assistant United States Attorney